1 2	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA				
3					
4	In the Matter of:	_Case No. 2006-72			
5	LINDA CAROLE ALLEN MCJUNKIN 11782 Butte Creek Island Road				
6	Chico, CA 95928				
7	Registered Nurse License No. 180873				
8	Respondent.				
9					
10	<u>DECISION AND</u>	ORDER			
11	The attached Stipulated Surrender of License and Order is hereby adopted by the				
12	Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.				
13					
14	It is so ORDERED on SEPTEMBER 20TH, 2007.				
15					
16	This Decision shall become effective on OCTOBER 20 TH 2007.				
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18	Roth Am Ten	- meu Pu			
19	Ruth Ann Terry, Executive Officer				
20	FOR THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS				
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BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of:

LINDA CAROLE ALLEN MCJUNKIN 11782 Butte Creek Island Road Chico, CA 95928

Registered Nurse License No. 180873

Respondent.

Case No. 2006-72

STIPULATED SURRENDER OF LICENSE AND ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the parties that the following matters are true:

PARTIES

- 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of the Board of Registered Nursing, who brought this action solely in her official capacity.
- 2. Linda Carole Allen McJunkin (Respondent), is a probationary registered nurse.

JURISDICTION

3. On July 20, 2006, the Board of Registered Nursing adopted Stipulated Settlement and Disciplinary Order No. 2006 - 72, which became effective on August 20, 2006. The Stipulated Settlement and Disciplinary Order requires, inter alia, the respondent to serve a three year probation term that includes Probation Conditions # 1 through # 14. The Stipulated Settlement and Disciplinary Order is attached as exhibit A and incorporated herein by reference.

Condition #13 of the Stipulated Settlement and Disciplinary Order allows the Board of Registered Nursing to accept the surrender of the respondent's license if she ceases practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation.

ADVISEMENT AND WAIVERS

- 4. Respondent has carefully read and understands Stipulated Settlement and Disciplinary Order No. 2006-72. Respondent has carefully read, and understands the effects of this Stipulated Surrender of License and Order and understands that this Stipulated Settlement, if accepted by the Board, is considered as formal discipline of her license.
- 5. Respondent understands that by signing this stipulation she enables the Board to accept the surrender of her Registered Nurse License without further process.

CONTINGENCY

- 6. The Respondent understands and agrees that by signing this Stipulated Settlement, that she may not withdraw her agreement or seek to rescind the stipulation prior to the date it becomes effective. If the Board declines to accept this stipulation as its Decision and Order, the Stipulated Surrender and Order shall be of no force or effect.
- 7. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.
- 8. In consideration of the foregoing stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Registered Nurse License No.180873, issued to Respondent Linda Carole Allen McJunkin, are surrendered and the surrender is accepted by the Board of Registered Nursing.

- 9. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.
- 10. Respondent shall lose all rights and privileges as a Registered Nurse in California as of the effective date of the Board's Decision and Order.

- 11. Respondent shall cause to be delivered to the Board both her wall and pocket license certificate on or before the effective date of the Decision and Order.
- 12. Respondent fully understands and agrees that if she ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed.
- by the Board, Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$5,000.00 which is the amount currently owed pursuant to Stipulated Settlement and Disciplinary Order No. 2006-72 (Exhibit A). If the reinstatement of Respondent's license is granted, Respondent shall be permitted to pay these costs in a payment plan approved by the Board.
- 14. Respondent shall not apply for licensure or petition for reinstatement for one (1) year from the effective date of the Board of Registered Nursing's Decision and Order.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order Management Registered Nursing, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: Quarest 10, 2009

LINDA CAROLE ALLEM MCJUNKIN
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully accepted by Ruth Ann Terry, Executive Officer for the Board of Registered Nursing.

DATED: 9/(0/07.

RUTH ANN TERRY Executive Officer

BOARD OF REGISTERED NURSING

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EXHIBIT "A"

Proposed Decision and Disciplinary Order No. 2006-72

BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of the Accusation Against:

LINDA CAROLE ALLEN MCJUNKIN 11782 Butte Creek Island Road Chico, CA 95928

Registered Nurse License No. 180873

Respondent

Case No. 2006-72

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as it's Decision in the above entitled matter.

This Decision shall become effective on August 20, 2006.

IT IS SO ORDERED July 20, 2006.

Vice-President

Board of Registered Nursing Department of Consumer Affairs

State of California

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:			:		
		1	BILL LOCKYER. Attorney General of the State of California KENT D. HARRIS. State Bar No. 144804 Deputy Attorney General California Department of Justice 1300 Street, Suite 125 P.O. Box 944255 Sacramento, CA 94244-2550		
		5	Telephone: (916) 324-7859 Facsimile: (916) 327-8643		
		6 7	Attorneys for Complainant		
		8	BEFORE THE		
		9	DEPARTMENT OF CONSUMER AFFAIRS		
		10	STATE OF CAL	IFORNIA	
		11	In the Matter of the Accusation Against:	Case No. 2006-72	
		12	LINDA CAROLE ALLEN MCJUNKIN 11782 Butte Creek Island Road	OAH No. 2006010553	
		1.3	Chico, California 95928	STIPULATED SETTLEMENT AND	
		14	Registered Nurse License No. 180873	DISCIPLINARY ORDER	
		15	Respondent.		
		1:6			
		17	IT IS HEREBY STIPULATED AND	AGREED by and between the parties to the	
		18	above-entitled proceedings that the following matters are true:		
		19	_	•	
		20	PARTIES 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of the Board of Registered Nursing. She brought this action solely in her official capacity and is		
		21			
		22			
		23	represented in this matter by Bill Lockyer, Attorney General of the State of California, by Kent		
		24	D. Harris, Deputy Attorney General. 2. Respondent Linda Carole Allen McJunkin (Respondent) is represented in this proceeding by attorney Anthony D. Lauria, Esq., whose address is Lauria, Tokunaga, Gates & Linn, LLP, 1001 G Street, Suite 101, Sacramento, CA 95814.		
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		28	III		
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1	3. On or about July 31, 1967, the Board of Registered Nursing issued		
2	Registered Nurse License No. 180873 to Linda Carole Allen McJunkin (Respondent). The		
3	License was in full force and effect at all times relevant to these proceedings.		
4	JURISDICTION		
5	4. Accusation No. 2006-72 was filed before the Board of Registered Nursing		
6	(Board), Department of Consumer Affairs, and is currently pending against Respondent. The		
7	Accusation and all other statutorily required documents were properly served on Respondent on		
8	November 21, 2005. Respondent timely filed her Notice of Defense contesting the Accusation.		
9	A copy of Accusation No. 2006-72 is attached as exhibit A and incorporated herein by reference.		
10	ADVISEMENT AND WAIVERS		
11	5. Respondent has carefully read, fully discussed with counsel, and		
12	understands the charges and allegations in Accusation No. 2006-72. Respondent has also		
13	carefully read, fully discussed with counsel, and understands the effects of this Stipulated		
14	Settlement and Disciplinary Order.		
15	6. Respondent is fully aware of her legal rights in this matter, including the		
16	right to a hearing on the charges and allegations in the Accusation; the right to be represented by		
17	counsel at her own expense; the right to confront and cross-examine the witnesses against her;		
18	the right to present evidence and to testify on her own behalf; the right to the issuance of		
19	subpoenas to compel the attendance of witnesses and the production of documents; the right to		
20	reconsideration and court review of an adverse decision; and all other rights accorded by the		
21	California Administrative Procedure Act and other applicable laws.		
22	7. Respondent voluntarily, knowingly, and intelligently waives and gives up		
23	each and every right set forth above.		
24	CULPABILITY		
25	8. Respondent admits the truth of each and every charge and allegation in		
26	Accusation No., 2006-72.		
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9. Respondent agrees that her Registered Nurse License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

RESERVATION

10. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board of Registered Nursing or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

- Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.
- 12. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.
- 13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

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restored.

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 180873 issued to Respondent Linda Carole Allen McJunkin is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions.

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. Obey All Laws. Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. Comply with the Board's Probation Program. Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times maintain an active, current license status with the Board, including during any period of suspension.

Upon successful completion of probation, Respondent's license shall be fully

 3. Report in Person. Respondent, during the period of probation, shall appear in person at interviews/meetings as directed by the Board or its designated representatives.

4. Residency, Practice, or Licensure Outside of State. Periods of residency or practice as a registered nurse outside of California shall not apply toward a reduction of this probation time period. Respondent's probation is tolled, if and when she resides outside of California. Respondent must provide written notice to the Board within 15 days of any change of residency or practice outside the state, and within 30 days prior to re-establishing residency or returning to practice in this state.

Respondent shall provide a list of all states and territories where she has ever been licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide information regarding the status of each license and any changes in such license status during the term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing license during the term of probation.

5. Submit Written Reports. Respondent, during the period of probation, shall submit or cause to be submitted such written reports/declarations and verification of actions under penalty of perjury, as required by the Board. These reports/declarations shall contain statements relative to Respondent's compliance with all the conditions of the Board's Probation Program. Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

Respondent shall provide a copy of this Decision to the nursing regulatory agency in every state and territory in which she has a registered nurse license.

6. Function as a Registered Nurse. Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

For purposes of compliance with the section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

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The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

If Respondent has not complied with this condition during the probationary term. and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

7. Employment Approval and Reporting Requirements. Respondent shall obtain prior approval from the Board before commencing or continuing any employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this Decision to her employer and immediate supervisors prior to commencement of any nursing or other health care related employment.

In addition to the above, Respondent shall notify the Board in writing within seventy-two (72) hours after she obtains any nursing or other health care related employment. Respondent shall notify the Board in writing within seventy-two (72) hours after she is terminated or separated, regardless of cause, from any nursing, or other health care related employment with a full explanation of the circumstances surrounding the termination or separation.

8. Supervision. Respondent shall obtain prior approval from the Board regarding Respondent's level of supervision and/or collaboration before commencing or continuing any employment as a registered nurse, or education and training that includes patient care.

Respondent shall practice only under the direct supervision of a registered nurse in good standing (no current discipline) with the Board of Registered Nursing, unless alternative

methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are approved.

Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

- (a) Maximum The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.
- (b) Moderate The individual providing supervision and/or collaboration is in the patient care unit or in any other work setting at least half the hours Respondent works.
- (c) Minimum The individual providing supervision and/or collaboration has person-to-person communication with Respondent at least twice during each shift worked.
- (d) Home Health Care If Respondent is approved to work in the home health care setting, the individual providing supervision and/or collaboration shall have person-to-person communication with Respondent as required by the Board each work day. Respondent shall maintain telephone or other telecommunication contact with the individual providing supervision and/or collaboration as required by the Board during each work day. The individual providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to patients' homes visited by Respondent with or without Respondent present.
- 9. Employment Limitations. Respondent shall not work for a nurse's registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse, or for an in-house nursing pool.

Respondent shall not work for a licensed home health agency as a visiting nurse unless the registered nursing supervision and other protections for home visits have been approved by the Board. Respondent shall not work in any other registered nursing occupation where home visits are required.

Respondent shall not work in any health care setting as a supervisor of registered nurses. The Board may additionally restrict Respondent from supervising licensed vocational of Chive Property of the Proper

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Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board approved continuing education program.

Respondent shall work only on a regularly assigned, identified and predetermined worksite(s) and shall not work in a float capacity.

If Respondent is working or intends to work in excess of 40 hours per week, the Board may request documentation to determine whether there should be restrictions on the hours of work.

10. Complete a Nursing Course(s). Respondent, at her own expense, shall enroll and successfully complete a course(s) relevant to the practice of registered nursing no later than six months prior to the end of her probationary term.

Respondent shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall submit to the Board the original transcripts or certificates of completion for the above required course(s). The Board shall return the original documents to Respondent after photocopying them for its records.

11. Cost Recovery. Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$5,000.00. Respondent shall be permitted to pay these costs in a payment plan approved by the Board, with payments to be completed no later than three months prior to the end of the probation term.

If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation will apply.

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12. Violation of Probation. If Respondent violates the conditions of her probation, the Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's license.

If during the period of probation, an accusation or petition to revoke probation has been filed against Respondent's license or the Attorney General's Office has been requested to prepare an accusation or petition to revoke probation against Respondent's license, the probationary period shall automatically be extended and shall not expire until the accusation or petition has been acted upon by the Board.

License Surrender. During Respondent's term of probation, if she ceases practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation, Respondent may surrender her license to the Board. The Board reserves the right to evaluate Respondent's request and to exercise its discretion whether to grant the request, or to take any other action deemed appropriate and reasonable under the circumstances, without further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be subject to the conditions of probation.

Surrender of Respondent's license shall be considered a disciplinary action and shall become a part of Respondent's license history with the Board. A registered nurse whose license has been surrendered may petition the Board for reinstatement no sooner than the following minimum periods from the effective date of the disciplinary decision:

- (1) Two years for reinstatement of a license that was surrendered for any reason other than a mental or physical illness; or
 - (2) One year for a license surrendered for a mental or physical illness.
- 14. Therapy or Counseling Program. Respondent, at her expense, shall participate in an on-going counseling program until such time as the Board releases her from this requirement and only upon the recommendation of the counselor. Written progress reports from the counselor will be required at various intervals.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Anthony D. Lauria, Esq.. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

I have read and fully discussed with Respondent Linda Carole Allen McJunkin the terms and conditions and other matters contained in the above Stipulated Settlement and

Respondent

Disciplinary Order. I approve its form and content.

DATED:

ANTHONY D. LAURIA, ESQ. Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: 5/1/06

BILL LOCKYER, Attorney General of the State of California

KENT D. HARRIS Deputy Attorney General

Attorneys for Complainant

DOJ Docket/Matter ID Number: 03579110-SA2005100148 McJunkin stip.wpd

364kb 09 270 (100) - 500

Exhibit A
Accusation No. 2006-72

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2					
3	Deputy Attorney General California Department of Justice				
4	1300 I Street, Suite 125 P.O. Box 944255				
5					
6	Facsimile: (916) 327-8643				
7	Attorneys for Complainant				
8	BEFORE THE				
9	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA				
10		AI-OIU(IA			
11	In the Matter of the Accusation Against:	Case No. 2006-72			
12	LINDA CAROLE ALLEN MCJUNKIN, a.k.a., LINDA C. ALLEN,	4.00770.4.			
13	a.k.a., LINDA C. McJUNKIN	ACCUSATION			
14	11782 Butte Creek Island Road Chico, California 95928				
15	Registered Nurse License No. 180873				
16	Respondent.				
17					
18					
19	Ruth Ann Terry, M.P.H., R.N. ("Com	plainant") alleges:			
20	PARTIE	<u>s</u>			
21	1. Complainant brings this Accusation solely in her official capacity as the				
22	Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.				
23	Registered Nurse License				
24	2. On or about July 31, 1967, the Board of Registered Nursing issued				
25	Registered Nurse License Number 180873 ("license") to Linda C. Allen, also known as Linda				
26	Carole Allen McJunkin and Linda C. McJunkin ("Respondent"). The license will expire on				
27	March 31, 2007, uriless renewed.				
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STATUTORY PROVISIONS

- 3. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.
- 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.
 - 5. Code section 2761 states, in pertinent part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- (a) Unprofessional conduct, . . . "
- 6. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

- 7. Respondent has subjected her license to discipline under Code section 2761, subdivision (a), on the grounds of unprofessional conduct. On or about October 30, 2002, while on duty as a registered nurse at the Fremont Medical Center, Yuba City, California, and caring for patient B., Respondent committed the following acts:
- Respondent grabbed patient B.'s face, gripping the area around the patient's jaw, and told her to "shut up."
- b. Later the same evening, Respondent slapped patient B across the face with

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Revoking or suspending Registered Nurse License Number 180873, issued to Linda Carole Allen McJunkin, also known as Linda C. Allen and Linda C. McJunkin;
- 2. Ordering Linda Carole Allen McJunkin, also known as Linda C. Allen and Linda C. McJunkin, to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Code section 125.3; and,
 - 3. Taking such other and further action as deemed necessary and proper.

DATED: 1/19/05

03579110-SA2005100148 McJunkin.Acc.wpd ps (10/21/05) RUTH ANN TERRY, M.P.H., R.N

Executive Officer

Board of Registered Nursing Department of Consumer Affairs

State of California Complainant